IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

MICHELLE TEXIER,

Plaintiff,

-against-

Civil Action No. 3:19-cv-21644-FLW-DEA

CAMPUS EYE GROUP ASC, LLC; CAMPUS EYE GROUP ASC, P.C.; CAMPUS EYE GROUP, LLC; PATRICIA DELANEY (In Her Individual and Official Capacity); PAMELA TODD (In Her Individual and Official Capacity); and DENISE AGNESS (In Her Individual and Official Capacity),

Defendants.

STIPULATION OF THE PARTIES AND CONSENT ORDER EXTENDING DISCOVERY DEADLINES

And now, this 18th day of December, 2020, Plaintiff Michelle Texier, Defendant Campus Eye Group ASC, LLC, Defendant Campus Eye Group ASC, PC, Defendant Campus Eye Group, LLC, and Defendant Pamela Todd, by their undersigned counsel, stipulate as follows:

- The parties will have an additional 14 days to respond to all previously served discovery requests;
- 2. Defendant Pamela Todd's deposition may be held on a date later than the currently proposed date of January 26, 2021, if needed and requested by her counsel; and
- 3. The deadlines set forth in the Scheduling Order in this matter, which was entered on October 15, 2021, following a pretrial conference pursuant to Rule 16, Federal Rules of Civil Procedure, shall be extended as follows:
 - a. Motions to amend or to add parties to be filed by: January 7, 2021

- b. Factual discovery to be completed by: April 23, 2021
- c. Plaintiff's expert report due on: March 14, 2021
- d. Defendant's expert report due on: June 11, 2021
- e. Expert depositions to be completed by: June 25, 2021
- 4. No previous extensions have been requested or granted for any party.
- 5. The previously set telephone conference will proceed on January 11, 2021, at 3:00 pm as scheduled.

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Attorneys for Defendants Campus Eye
Group ASC, LLC, Campus Eye Group
ASC, PC, and Campus Eye Group, LLC,

So ORDERED:

<u>s/ Douglas E. Arpert</u> **DOUGLAS E. ARPERT UNITED STATES MAGISTRATE JUDGE**